

1 PHILLIP A. TALBERT
2 United States Attorney
3 KEVIN C. KHASIGIAN
4 Assistant U.S. Attorney
5 501 I Street, Suite 10-100
6 Sacramento, CA 95814
7 Telephone: (916) 554-2700

8 Attorneys for the United States

9

10

11 IN THE UNITED STATES DISTRICT COURT
12
13 EASTERN DISTRICT OF CALIFORNIA

14

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 APPROXIMATELY 10.19321397
19 BITCOIN,

20 Defendant.

21-CV-02353-TLN-DB

22 DECLARATION OF TAMMY TEGLIA IN
23 SUPPORT OF *EX PARTE* MOTION FOR
24 DEFAULT JUDGMENT AND FINAL
25 JUDGMENT OF FORFEITURE

26 I, TAMMY TEGLIA, declare as follows:

27 1. I am the Paralegal Specialist assigned to the above-captioned civil forfeiture action.

28 2. I have personal knowledge of the following matters, except those stated on information
and belief, and as to those matters I believe them to be true, and if called as a witness in this proceeding,
after being duly sworn, I could and would competently testify thereto.

29 **Caroline Hepworth**

30 3. On January 6, 2022, the United States mailed copies of the complaint, application and
31 order for publication, warrant for arrest, order requiring service of process and joint status report, order re
32 filing requirements, and court notices to Caroline Hepworth at 246 Schlaf Drive, Oroville, CA 95965, by
33 first class mail and certified mail number 7018 0360 0000 6580 0529. The PS Form 3811 (certified mail
34 "green card" showing delivery of mail) was signed by Caroline Hepworth on January 19, 2022. A true
35 copy of the PS Form 3811 is attached hereto as Exhibit A.

1 and correct copy of the letters mailed to Caroline Hepworth and the certified mail receipt are attached as
2 Exhibit A.

3 4. On January 19, 2022, the U.S. Secret Service personally served the above-listed
4 documents on Caroline Hepworth at 246 Schlaf Drive, Oroville, CA 95965. A true and correct copy of
5 the Process Receipt and Return filed March 2, 2022, is attached as Exhibit B.

6 5. On or about January 25, 2022, Ms. Hepworth submitted a Consent of U.S. Magistrate
7 Judge Jurisdiction form to the Clerk's Office for filing (ECF No. 7). On January 27, 2022, the U.S.
8 Secret Service case agent told me he spoke to Ms. Hepworth regarding the Consent of U.S. Magistrate
9 Judge Jurisdiction form she submitted to the Clerk's Office. The agent informed me that Ms. Hepworth
10 misunderstood what she was consenting to, did not want to file a claim in this case, and asked how she
11 could have the form rescinded. The agent said he told Ms. Hepworth she should contact the Clerk's
12 Office to see if the form could be withdrawn. Later that day, the agent told me that Ms. Hepworth had
13 called the Clerk's Office and was told they would make a note to disregard the paperwork she sent them.
14 The docket says "[DISREGARD – Filed in error]" for document number 7. ECF No. 7.

15 **Binance**

16 6. On January 6, 2022, the United States mailed copies of the above-listed documents to
17 Binance at Level 3, Melita Court, Triq Giuseppe Cali, Ta'Xbiex XBX 1420 Malta, by International
18 Federal Express. According to Federal Express, the package was refused by Binance on January 12,
19 2022. A true and correct copy of the letter sent to Binance and the Federal Express tracking history are
20 attached as Exhibit C.

21 7. On January 6, 2022, the United States sent copies of the above-listed documents to
22 Binance by email to the following email address: case@binance.com. On January 6, 2022, Binance
23 responded via email that they were receiving heavy email traffic and would respond to our inquiry
24 shortly. On January 26, 2022, I received formal correspondence from an individual named Nikolai with
25 the Binance Case Team. Nikolai's correspondence provided information on the Binance Case unit and
26 an attached document set forth the current balance for the account the United States seized the defendant
27 cryptocurrency from, as well as information specific to Binance concerning account freezes, seizures, and

1 transferring funds. True and correct copies of the emails sent to and received from Binance are attached
2 as Exhibit D.

3 **Tarun Kumar Arora**

4 8. On March 10, 2022, the United States sent copies of the above-listed documents to Tarun
5 Kumar Arora via email pursuant to the Order Permitting Direct Notice of Complaint for Forfeiture by
6 Email filed March 10, 2022. The email was sent to Tarun Kumar Arora at the following email addresses:
7 tarun_0085@rediffmail.com and tarun13335@gmail.com. A true and correct copy of the email and letter
8 sent to Tarun Kumar Arora are attached as Exhibit E.

9 9. To date, no claim or answer has been filed by or on behalf of Caroline Hepworth, Binance,
10 or Tarun Kumar Arora, as required by Rule G(5) of the Supplemental Rules for Admiralty or Maritime
11 Claims and Asset Forfeiture Actions, and their time to file a claim and answer has expired.

12 10. The defendant cryptocurrency was arrested on March 7, 2022, by the U.S. Secret Service.
13 See Process Receipt and Return filed March 8, 2022.

14 11. Beginning on January 8, 2022, for at least thirty consecutive days, the United States
15 published Notice of the Forfeiture Action on the official internet government forfeiture site
16 www.forfeiture.gov. A Declaration of Publication was filed on March 2, 2022.

17 I declare under penalty of perjury that the foregoing is true and correct.

18 Executed this 17th day of May, 2022.

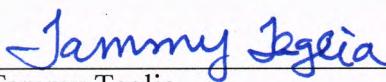
19 
20 Tammy Teglia
Paralegal Specialist

EXHIBIT A



U.S. DEPARTMENT OF JUSTICE

*United States Attorney
Eastern District of California*

*Phillip A. Talbert
United States Attorney*

501 I Street, Suite 10-100 Phone 916/554-2700
Sacramento, CA 95814 Fax 916/554-2900
 TTD 916/554-2855

January 6, 2022

FIRST CLASS MAIL

NOTICE OF FORFEITURE ACTION

Caroline Hepworth
246 Schlaf Drive
Oroville, CA 95965

Re: Approximately 10.19321397 Bitcoin, 2:21-CV-02353-JAM-DB

Dear Potential Claimant(s):

This is to advise you that a Verified Complaint for Forfeiture *In Rem* has been filed against the above-described property. Enclosed are copies of the complaint, application and order for publication, warrant for arrest, order requiring service of process and joint status report, order re filing requirements, notice of availability of a magistrate judge, and notice of availability of voluntary dispute resolution.

We are informing you of the filing of this Complaint because you may have the right to appear in this action and contest the forfeitability of the property. If you intend to contest forfeitability, a Claim, signed under penalty of perjury, must be filed with the Court no later than thirty-five (35) days after the date of this notice; and an Answer or a motion under Rule 12 of the Federal Rules of Civil Procedure ("Fed. R. Civ. P.") must be filed with the Court within twenty-one (21) days of the filing of your claim. Please contact the Clerk of the U.S. District Court at 916/930-4000 for specific inquiries concerning the procedure for the filing of your Claim and Answer. A copy of any document filed with the Court must be served on this office. If you have an adequate reason, you may be able to obtain a reasonable extension of time for the filing of either the Claim or Answer by contacting me at the number provided below.

The Claim as submitted will have to be in compliance with the provisions of Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions in that it must identify the specific property being claimed, identify the claimant and state the claimant's interest in the property, and it must be signed under penalty of perjury by you.

If no Claim has been filed with the Court and served on this office within thirty-five (35) days of the date of this notice, we will assume that you do not intend to intervene and will take a default judgment against your interest in the defendant property at that time.

The government may also consider granting petitions for remission or mitigation, which pardon all or part of the property from the forfeiture. A petition must include a description of your interest in the property supported by documentation; include any facts you believe justify the return of the property; and be signed under oath, subject to the penalty of perjury, or meet the requirements of an unsworn statement under penalty of perjury. *See* 28 U.S.C. Section 1746. For the regulations pertaining to remission or mitigation of the forfeiture, see 28 C.F.R. Sections 9.1 - 9.9. The criteria for remission of the forfeiture are found at 28 C.F.R. Section 9.5(a). The criteria for mitigation of the forfeiture are found at 28 C.F.R. Section 9.5(b). The petition need not be made in any particular form and may be filed online or in writing. You should file a petition not later than 11:59 p.m. EST thirty (30) days after the date of this notice. *See* 28 C.F.R. Section 9.3(a). The <https://www.forfeiture.gov/FilingPetition.htm> website provides access to a standard petition form that may be mailed and the link to file a petition online. If you cannot find the desired assets online, you must file your petition in writing by sending it to Assistant U.S. Attorney Kevin C. Khasigian, 501 I Street, Suite 10-100, Sacramento, CA 95814. This website provides answers to frequently asked questions (FAQs) about filing a petition. You may file both a verified claim with the court and a petition for remission or mitigation.

Please advise us prior to the filing deadline if you have any problems with the preparation and filing of a Claim, or with the time limitations. I can be reached at 916/554-2768.

Sincerely,

Phillip A. Talbert
United States Attorney



TAMMY TEGLIA
Paralegal Specialist
Asset Forfeiture Unit

Enclosures



U.S. DEPARTMENT OF JUSTICE

*United States Attorney
Eastern District of California*

*Phillip A. Talbert
United States Attorney*

501 I Street, Suite 10-100
Sacramento, CA 95814

Phone 916/554-2700
Fax 916/554-2900
TTD 916/554-2855

January 6, 2022

CERTIFIED MAIL

NOTICE OF FORFEITURE ACTION

Caroline Hepworth
246 Schlaf Drive
Oroville, CA 95965

Re: Approximately 10.19321397 Bitcoin, 2:21-CV-02353-JAM-DB

Dear Potential Claimant(s):

This is to advise you that a Verified Complaint for Forfeiture *In Rem* has been filed against the above-described property. Enclosed are copies of the complaint, application and order for publication, warrant for arrest, order requiring service of process and joint status report, order re filing requirements, notice of availability of a magistrate judge, and notice of availability of voluntary dispute resolution.

We are informing you of the filing of this Complaint because you may have the right to appear in this action and contest the forfeitability of the property. If you intend to contest forfeitability, a Claim, signed under penalty of perjury, must be filed with the Court no later than thirty-five (35) days after the date of this notice; and an Answer or a motion under Rule 12 of the Federal Rules of Civil Procedure ("Fed. R. Civ. P.") must be filed with the Court within twenty-one (21) days of the filing of your claim. Please contact the Clerk of the U.S. District Court at 916/930-4000 for specific inquiries concerning the procedure for the filing of your Claim and Answer. A copy of any document filed with the Court must be served on this office. If you have an adequate reason, you may be able to obtain a reasonable extension of time for the filing of either the Claim or Answer by contacting me at the number provided below.

The Claim as submitted will have to be in compliance with the provisions of Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions in that it must identify the specific property being claimed, identify the claimant and state the claimant's interest in the property, and it must be signed under penalty of perjury by you.

If no Claim has been filed with the Court and served on this office within thirty-five (35) days of the date of this notice, we will assume that you do not intend to intervene and will take a default judgment against your interest in the defendant property at that time.

The government may also consider granting petitions for remission or mitigation, which pardon all or part of the property from the forfeiture. A petition must include a description of your interest in the property supported by documentation; include any facts you believe justify the return of the property; and be signed under oath, subject to the penalty of perjury, or meet the requirements of an unsworn statement under penalty of perjury. *See* 28 U.S.C. Section 1746. For the regulations pertaining to remission or mitigation of the forfeiture, see 28 C.F.R. Sections 9.1 - 9.9. The criteria for remission of the forfeiture are found at 28 C.F.R. Section 9.5(a). The criteria for mitigation of the forfeiture are found at 28 C.F.R. Section 9.5(b). The petition need not be made in any particular form and may be filed online or in writing. You should file a petition not later than 11:59 p.m. EST thirty (30) days after the date of this notice. *See* 28 C.F.R. Section 9.3(a). The <https://www.forfeiture.gov/FilingPetition.htm> website provides access to a standard petition form that may be mailed and the link to file a petition online. If you cannot find the desired assets online, you must file your petition in writing by sending it to Assistant U.S. Attorney Kevin C. Khasigian, 501 I Street, Suite 10-100, Sacramento, CA 95814. This website provides answers to frequently asked questions (FAQs) about filing a petition. You may file both a verified claim with the court and a petition for remission or mitigation.

Please advise us prior to the filing deadline if you have any problems with the preparation and filing of a Claim, or with the time limitations. I can be reached at 916/554-2768.

Sincerely,

Phillip A. Talbert
United States Attorney



TAMMY TEGLIA
Paralegal Specialist
Asset Forfeiture Unit

Enclosures

U.S. POSTAL SERVICE
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com.

OFFICIAL USE

6580
0000
0360
7018

Certified Mail Fee \$	
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$ _____
<input type="checkbox"/> Return Receipt (electronic)	\$ _____
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ _____
<input type="checkbox"/> Adult Signature Required	\$ _____
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ _____
Postage	
 Caroline Hepworth 246 Schlaf Drive Oroville, CA 95965	

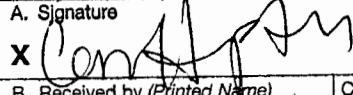
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

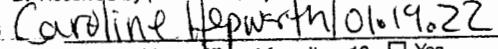
- Complete Items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

COMPLETE THIS SECTION ON DELIVERY

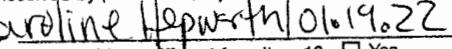
A. Signature


 Agent
 Addressee

B. Received by (Printed Name)



C. Date of Delivery


Delivery address different from item 1? Yes'ES, enter delivery address below: No

Caroline Hepworth
246 Schlaf Drive
Oroville, CA 95965



9590 9402 5505 9249 5441 49

2. Article Number (Transfer from service label)

7018 0360 0000 6580 0529

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over \$500)

- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Return Receipt for Merchandise
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

EXHIBIT B



Department of the Treasury
Federal Law Enforcement Agencies
PROCESS RECEIPT AND RETURN

PLAINTIFF United States of America		COURT CASE NUMBER 2:21-CV-02353-JAM-DB	
DEFENDANT Approximately 10.19321397 Bitcoin		TYPE OF PROCESS Service	
SERVE AT	NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE Caroline Hepworth		
	ADDRESS (Street or RFD, Apartment No., City, State and Zip Code) 246 Schlaf Drive, Oroville, CA 95965		
SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW U.S. Attorney's Office Attn: T. Teglia 501 I Street, Suite 10-100 Sacramento, CA 95814		NUMBER OF PROCESS TO BE SERVED IN THIS CASE	
		NUMBER OF PARTIES TO BE SERVED IN THIS CASE	
		CHECK BOX IF SERVICE IS ON USA	
<p>SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Includes Business and Alternate Addresses, Telephone Numbers, and Estimated Times Available For Service)</p> <p>Please personally serve Caroline Hepworth at the above address with copies of the complaint, application and order for publication, warrant for arrest, order requiring service of process and joint status report, order re filing requirements, notice of availability of a magistrate judge, notice of availability of voluntary dispute resolution, and notice of forfeiture action.</p>			
Signature of Attorney or other Originator requesting service on behalf of <i>Tammy Teglia</i>		<input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT	TELEPHONE NO. Tammy (916) 554-2768
SIGNATURE AND DATE OF PERSON ACCEPTING PROCESS <i>Caron R. Johnson</i>		DATE <i>01.19.2022</i>	
SPACE BELOW FOR USE OF TREASURY LAW ENFORCEMENT AGENCY			
I acknowledge receipt for the total number Of process indicated	District of Origin No.	District to Serve No.	SIGNATURE OF AUTHORIZED TREASURY AGENCY OFFICER
DATE			
<p>I HEREBY CERTIFY AND RETURN THAT I <input checked="" type="checkbox"/> PERSONALLY SERVED. <input type="checkbox"/> HAVE LEGAL EVIDENCE OF SERVICE. <input type="checkbox"/> HAVE EXECUTED AS SHOWN IN "REMARKS", THE PROCESS DESCRIBED ON THE INDIVIDUAL, COMPANY, CORPORATION ETC. AT THE ADDRESS SHOWN ABOVE OR ON THE ADDRESS INSERTED BELOW</p> <p><input type="checkbox"/> I HEREBY CERTIFY AND RETURN THAT I AM UNABLE TO LOCATE THE INDIVIDUAL, COMPANY, CORPORATION, ETC NAMED ABOVE.</p>			
NAME & TITLE OF INDIVIDUAL SERVED IF NOT SHOWN ABOVE:		<input type="checkbox"/> A person of suitable age and discretion then residing In the defendant's usual place of abode.	
ADDRESS: (Complete only if different than shown above)		DATE OF SERVICE <i>1-19-22</i>	TIME OF SERVICE <i>2:52</i>
		<input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	
SIGNATURE, TITLE AND TREASURY AGENCY <i>Mark Rizzo, Special Agent USSS</i>			
REMARKS:			

2:21-cv-02353-JAM-DB USA v. Approx. 10.19321397 Bitcoin

CIVIL

U.S. District Court

Eastern District of California - Live System

Notice of Electronic Filing

The following transaction was entered by Khasigian, Kevin on 3/2/2022 at 9:01 AM PST and filed on 3/2/2022

Case Name: USA v. Approx. 10.19321397 Bitcoin

Case Number: 2:21-cv-02353-JAM-DB

Filer: United States of America

Document Number: 8

Docket Text:

CERTIFICATE of SERVICE by United States of America re [5] Writ Issued, [4] Proposed Order, [1] Complaint, [3] Civil New Case Documents for JAM, [6] Order. (Khasigian, Kevin)

2:21-cv-02353-JAM-DB Notice has been electronically mailed to:

Kevin Christopher Khasigian , GOVT kevin.khasigian@usdoj.gov, caseview.ecf@usdoj.gov, kendra.ford@usdoj.gov, kimberly.bradley@usdoj.gov, tammy.teglia@usdoj.gov, usacae.ecfsaccv@usdoj.gov

2:21-cv-02353-JAM-DB Electronically filed documents must be served conventionally by the filer to:

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: n/a

Electronic document Stamp:

[STAMP_dcecfStamp_ID=1064943537 [Date=3/2/2022] [FileNumber=11726440-0
] [35a29bde578d8e238cbbd07c9bc21f81c19332230318616bc5fb2e7741ceba1f9f0
ff54c8454935e7aa79f8b370100df3d6d708baf058332587059e5913af30d]]

EXHIBIT C



U.S. DEPARTMENT OF JUSTICE

*United States Attorney
Eastern District of California*

*Phillip A. Talbert
United States Attorney*

501 I Street, Suite 10-100 Phone 916/554-2700
Sacramento, CA 95814 Fax 916/554-2900
TTD 916/554-2855

January 6, 2022

INTERNATIONAL FEDERAL EXPRESS

NOTICE OF FORFEITURE ACTION

Binance
Level 3, Melita Court
Triq Giuseppe Cali
Ta' Xbiex XBX 1420 Malta

Re: Approximately 10.19321397 Bitcoin, 2:21-CV-02353-JAM-DB

Dear Potential Claimant(s):

This is to advise you that a Verified Complaint for Forfeiture *In Rem* has been filed against the above-described property. Enclosed are copies of the complaint, application and order for publication, warrant for arrest, order requiring service of process and joint status report, order re filing requirements, notice of availability of a magistrate judge, and notice of availability of voluntary dispute resolution.

We are informing you of the filing of this Complaint because you may have the right to appear in this action and contest the forfeitability of the property. If you intend to contest forfeitability, a Claim, signed under penalty of perjury, must be filed with the Court no later than thirty-five (35) days after the date of this notice; and an Answer or a motion under Rule 12 of the Federal Rules of Civil Procedure ("Fed. R. Civ. P.") must be filed with the Court within twenty-one (21) days of the filing of your claim. Please contact the Clerk of the U.S. District Court at 916/930-4000 for specific inquiries concerning the procedure for the filing of your Claim and Answer. A copy of any document filed with the Court must be served on this office. If you have an adequate reason, you may be able to obtain a reasonable extension of time for the filing of either the Claim or Answer by contacting me at the number provided below.

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The government may also consider granting petitions for remission or mitigation, which pardon all or part of the property from the forfeiture. A petition must include a description of your interest in the property supported by documentation; include any facts you believe justify the return of the property; and be signed under oath, subject to the penalty of perjury, or meet the requirements of an unsworn statement under penalty of perjury. *See* 28 U.S.C. Section 1746. For the regulations pertaining to remission or mitigation of the forfeiture, see 28 C.F.R. Sections 9.1 - 9.9. The criteria for remission of the forfeiture are found at 28 C.F.R. Section 9.5(a). The criteria for mitigation of the forfeiture are found at 28 C.F.R. Section 9.5(b). The petition need not be made in any particular form and may be filed online or in writing. You should file a petition not later than 11:59 p.m. EST thirty (30) days after the date of this notice. *See* 28 C.F.R. Section 9.3(a). The <https://www.forfeiture.gov/FilingPetition.htm> website provides access to a standard petition form that may be mailed and the link to file a petition online. If you cannot find the desired assets online, you must file your petition in writing by sending it to Assistant U.S. Attorney Kevin C. Khasigian, 501 I Street, Suite 10-100, Sacramento, CA 95814. This website provides answers to frequently asked questions (FAQs) about filing a petition. You may file both a verified claim with the court and a petition for remission or mitigation.

Please advise us prior to the filing deadline if you have any problems with the preparation and filing of a Claim, or with the time limitations. I can be reached at 916/554-2768.

Sincerely,

Phillip A. Talbert
United States Attorney



TAMMY TEGLIA
Paralegal Specialist
Asset Forfeiture Unit

Enclosures


[TRACK ANOTHER SHIPMENT](#)

775686359823


[ADD NICKNAME](#)
[ON TIME](#)


No scheduled delivery date available at this time.

Scheduled delivery:
Pending

**IN TRANSIT**

At FedEx destination facility
LUQA, MT

[GET STATUS UPDATES](#)
FROM

SACRAMENTO, CA US

TO

TA XBIEX, MT

Travel History

TIME ZONE
Local Scan Time



Monday, January 24,
2022

5:22 PM LUQA MT At local FedEx facility

Friday, January 21,
2022

5:52 PM LUQA MT At local FedEx facility

Thursday, January 20,
2022

5:58 PM LUQA MT At local FedEx facility

Wednesday, January 12,
2022

11:20 AM LUQA MT On FedEx vehicle for delivery

10:36 AM LUQA MT International shipment release - Import

10:36 AM LUQA MT In transit
Package available for clearance

10:36 AM LUQA MT At local FedEx facility

Tuesday, January 11, 2022

5:15 AM TREMBLAY EN FRANCE FR In transit

4:01 AM ROISSY CHARLES DE GAULLE CEDEX FR Departed FedEx hub

Saturday, January 8, 2022

11:08 PM ROISSY CHARLES DE GAULLE CEDEX FR International shipment release - Import

11:07 PM ROISSY CHARLES DE GAULLE CEDEX FR In transit
Package available for clearance

10:29 PM ROISSY CHARLES DE GAULLE CEDEX FR Arrived at FedEx hub

7:31 AM MEMPHIS, TN Departed FedEx hub

6:41 AM MEMPHIS, TN In transit

Friday, January 7, 2022

10:53 PM MEMPHIS, TN In transit

Thursday, January 6, 2022

4:41 PM SACRAMENTO, CA Picked up

4:12 PM Shipment information sent to FedEx

[Collapse History](#) 

Shipment Facts

TRACKING NUMBER	SERVICE	WEIGHT
775686359823	FedEx International Economy	1 lbs / 0.45 kgs
TOTAL PIECES	TOTAL SHIPMENT WEIGHT	TERMS
1	1 lbs / 0.45 kgs	Shipper
PURCHASE ORDER NUMBER	SHIPPER REFERENCE	PACKAGING
USA/SS/CAE1/SACR	Binance	FedEx Envelope

EXHIBIT D

Teglia, Tammy (USACAE)

From: Teglia, Tammy (USACAE)
Sent: Thursday, January 6, 2022 5:00 PM
To: case@binance.com
Subject: U.S. v. Approximately 10.19321397 Bitcoin, 2:21-CV-02353-JAM-DB
Attachments: potential clmnt ltr Binance.pdf; Complaint filed 12 17 21.pdf; publ app & ord lodged 12 17 21.pdf; arrest warrant clerks issued 1 4 22.pdf; Ord re Service and JSR.pdf; Ord Re Filing Requirements.pdf; Mag Judge Consent ntc.pdf; Voluntary Dispute Resolution ntc.pdf

Binance,

Please see the attached Notice of Forfeiture Action along with the court documents referenced in the notice. The documents were also sent to your office via International Federal Express today and is related to the Bitcoin seized pursuant to a Federal seizure warrant that was held in User ID 25002089/User ID Number R8750839, controlled by and in the name of Tarun Kumar Arora.

Thanks,

Tammy Teglia
Paralegal Specialist
Asset Forfeiture Unit
USAO - Eastern District of California
916/554-2768

“CONFIDENTIALITY NOTICE: This communication with its contents and attachments, if any, may contain confidential, law enforcement sensitive, privileged attorney/client communications or work products, and is not subject to disclosure. It is solely for the use of the intended recipients. Unauthorized interception, review, use or disclosure is prohibited. If you believe that you have received this email in error, please notify the sender immediately, and permanently delete the email, any attachments, and all copies from your computer.”

Teglia, Tammy (USACAE)

From: case <case+noreply@binance.com>
Sent: Thursday, January 6, 2022 5:01 PM
To: Teglia, Tammy (USACAE)
Subject: [EXTERNAL] Re: U.S. v. Approximately 10.19321397 Bitcoin, 2:21-CV-02353-JAM-DB

Hello,

Thank you for reaching out to Binance.

We are experiencing a high volume of inquiries at the moment and will greatly appreciate your patience.

We apologise in advance for the inconvenience.

Sincerely,
Binance Case Team

Teglia, Tammy (USACAE)

From: Binance Case Team <case@binance.com>
Sent: Wednesday, January 26, 2022 11:22 AM
To: Teglia, Tammy (USACAE)
Cc: case@binance.com
Subject: [Not Virus Scanned] [EXTERNAL] [Not Virus Scanned] Re: U.S. v. Approximately 10.19321397 Bitcoin, 2:21-CV-02353-JAM-DB
Attachments: Report_Tammy_Teglia_26_01_2022.zip

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Hi Tammy,

Thanks for the request.

Please refer to the attachment for the current balance available on the account.

Password for the file:

The amount available is around

A. For freezing of accounts, we would first require you agree on the assurance statement below.

- Binance Holdings Limited ("Binance") is a non-U.S. company and is therefore not subject to U.S. subpoenas or other compulsory process. However, as part of its commitment to cooperating with U.S. law enforcement, Binance is generally willing to make a voluntary production of responsive information to aid U.S. law enforcement. In order to process this request, please indicate your agreement to the following:

Any response by Binance to this request will be voluntary and Binance reserves its position on jurisdiction. Binance is a witness, and not a subject or target, of the investigation or matter in which the information is being sought. Although any Binance production will be voluntary, DOJ and its investigative partners will treat the information produced as though it is subject Rule 6(e) of the Federal Rules of Criminal Procedure which are the federal grand jury secrecy rules.

We accept digital email confirmation. For example "I, John Smith of FBI unit San Francisco office, agree to the above-proposed assurance by Binance. This email confirms my agreement and acknowledgment".

B. We also ask to clarify which contact details (email address, the full name of the agent in charge of this case, and case number) we can share with the owner of the frozen account, assuming they inquire about the status of their respective accounts.

C. For seizing and transferring of funds, we would require you to agree on the following:

1) Binance is able to transfer only that specific types and amounts of cryptocurrency that are available on the user account balance. Please provide us for a wallet address for each token you intend to seize from the requested account.

2) Agree that Binance can direct the account owner to communicate with law enforcement authorities directly by sharing the case number and official work email address of the agent or agency in charge of the seizure.

If you have any questions, please do not hesitate to contact us.

We will be looking forward to receiving your response.

Kind regards,
Nikolai

Binance Case Team
BINANCE
www.binance.com

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On Fri, Jan 7, 2022 at 3:00 AM 'Teglia, Tammy (USACAE)' via case <case@binance.com> wrote:

Binance,

Please see the attached Notice of Forfeiture Action along with the court documents referenced in the notice. The documents were also sent to your office via International Federal Express today and is related to the Bitcoin seized pursuant to a Federal seizure warrant that was held in User ID 25002089/User ID Number R8750839, controlled by and in the name of Tarun Kumar Arora.

Thanks,

Tammy Teglia

Paralegal Specialist

Asset Forfeiture Unit

916/554-2768

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EXHIBIT E

Teglia, Tammy (USACAE)

From: Teglia, Tammy (USACAE)
Sent: Thursday, March 10, 2022 2:22 PM
To: tarun_0085@rediffmail.com; tarun13335@gmail.com
Subject: U.S. v. Approximately 10.19321397 Bitcoin, 2:21-CV-02353-JAM-DB
Attachments: potential clmnt ltr Arora.pdf; Complaint filed 12 17 21.pdf; publ app & ord filed 1 6 22.pdf; arrest warrant clerks issued 1 4 22.pdf; Ord re Service and JSR.pdf; Ord Re Filing Requirements.pdf; Mag Judge Consent ntc.pdf; Voluntary Dispute Resolution ntc.pdf

Mr. Tarun Kumar Arora,

Please see the attached Notice of Forfeiture Action along with the court documents referenced in the notice. This is related to the Bitcoin seized pursuant to a Federal seizure warrant that was held in User ID 25002089/User ID Number R8750839 at Binance.

Let me know if you have questions.

Tammy Teglia
Paralegal Specialist
Asset Forfeiture Unit
USAO - Eastern District of California
916/554-2768

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U.S. DEPARTMENT OF JUSTICE

*United States Attorney
Eastern District of California*

Phillip A. Talbert
United States Attorney

501 I Street, Suite 10-100 Phone 916/554-2700
Sacramento, CA 95814 Fax 916/554-2900
 TTD 916/554-2855

March 10, 2022

VIA EMAIL

NOTICE OF FORFEITURE ACTION

Tarun Kumar Arora
Email addresses: tarun_0085@rediffmail.com
and tarun13335@gmail.com

Re: U.S. v. Approximately 10.19321397 Bitcoin, 2:21-CV-02353-JAM-DB

Dear Potential Claimant(s):

This is to advise you that a Verified Complaint for Forfeiture *In Rem* has been filed against the above-described property. Enclosed are copies of the complaint, application and order for publication, warrant for arrest, order requiring service of process and joint status report, order re filing requirements, notice of availability of a magistrate judge, and notice of availability of voluntary dispute resolution.

We are informing you of the filing of this Complaint because you may have the right to appear in this action and contest the forfeitability of the property. If you intend to contest forfeitability, a Claim, signed under penalty of perjury, must be filed with the Court no later than thirty-five (35) days after the date of this notice; and an Answer or a motion under Rule 12 of the Federal Rules of Civil Procedure ("Fed. R. Civ. P.") must be filed with the Court within twenty-one (21) days of the filing of your claim. Please contact the Clerk of the U.S. District Court at 916/930-4000 for specific inquiries concerning the procedure for the filing of your Claim and Answer. A copy of any document filed with the Court must be served on this office. If you have an adequate reason, you may be able to obtain a reasonable extension of time for the filing of either the Claim or Answer by contacting me at the number provided below.

The Claim as submitted will have to be in compliance with the provisions of Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions in that it must identify the specific property being claimed, identify the claimant and state the claimant's interest in the property, and it must be signed under penalty of perjury by you.

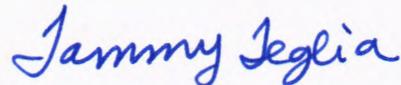
If no Claim has been filed with the Court and served on this office within thirty-five (35) days of the date of this notice, we will assume that you do not intend to intervene and will take a default judgment against your interest in the defendant property at that time.

The government may also consider granting petitions for remission or mitigation, which pardon all or part of the property from the forfeiture. A petition must include a description of your interest in the property supported by documentation; include any facts you believe justify the return of the property; and be signed under oath, subject to the penalty of perjury, or meet the requirements of an unsworn statement under penalty of perjury. See 28 U.S.C. Section 1746. For the regulations pertaining to remission or mitigation of the forfeiture, see 28 C.F.R. Sections 9.1 - 9.9. The criteria for remission of the forfeiture are found at 28 C.F.R. Section 9.5(a). The criteria for mitigation of the forfeiture are found at 28 C.F.R. Section 9.5(b). The petition need not be made in any particular form and may be filed online or in writing. You should file a petition not later than 11:59 p.m. EST thirty (30) days after the date of this notice. See 28 C.F.R. Section 9.3(a). The <https://www.forfeiture.gov/FilingPetition.htm> website provides access to a standard petition form that may be mailed and the link to file a petition online. If you cannot find the desired assets online, you must file your petition in writing by sending it to Assistant U.S. Attorney Kevin C. Khasigian, 501 I Street, Suite 10-100, Sacramento, CA 95814. This website provides answers to frequently asked questions (FAQs) about filing a petition. You may file both a verified claim with the court and a petition for remission or mitigation.

Please advise us prior to the filing deadline if you have any problems with the preparation and filing of a Claim, or with the time limitations. I can be reached at 916/554-2768.

Sincerely,

Phillip A. Talbert
United States Attorney



TAMMY TEGLIA
Paralegal Specialist
Asset Forfeiture Unit